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June 17, 2025

Honorable Katherine Polk Failla
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: USA v Storm, 23 Cr. 430 (KPF)

Dear Judge Failla:

Thank you for granting Paradigm Operations LP (“Paradigm”) leave to file an amicus brief in support of Roman Storm’s proposed jury instructions as to the 18 U.S.C. § 1960 conspiracy charge. Yesterday, the Clerk’s Office advised us that to file the brief, we would need permission from the Court to add Paradigm as a party in the litigation. Accordingly, we respectfully request that Your Honor allow Paradigm to appear as an “Interested Party” party, so that its amicus brief can be filed.

Respectfully submitted,



Celeste L.M. Koeleveld

cc: All counsel via ECF